

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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JUAN JOSE SALGUERO, OLVIN RAMON  
RODRIGUEZ, ALICIA RIVERIA GARCIA, THANIA  
VELASCO, CARLOS ROBERTO GARCIA, and  
YOVANY SIFORTES PINTO, on behalf of themselves  
and all others similarly situated,

Civil Action No.: 12-CV-0635  
(JFB)(AKT)

Plaintiffs,

-against-

JVK OPERATIONS LIMITED, VINOD SAMUEL,  
and MICHAEL CONNELL,

Defendants.  
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**NOTICE OF PLAINTIFFS' MOTION FOR APPROVAL OF CLASS  
REPRESENTATIVE SERVICE AWARDS AND RETALIATION PAYMENT**

For the reasons set forth in the Memorandum of Law in Support of Plaintiffs' Motion for Approval of Class Representative Service Awards and Retaliation Payment and in the Declaration of James W. Versocki in Support of Plaintiffs' Motion for Approval of Attorneys' Fees and Reimbursement of Expenses and Plaintiffs' Motion for Approval of Representative Service Awards and Retaliation Payment, Plaintiffs respectfully request that the Court enter an Order approving service awards for Class Representatives Juan Jose Salguero, Olvin Ramon Rodriguez, Alicia Riveria Garcia, Thania Velasco, Carlos Roberto Garcia, and Yovany Sifortes Pinto in the amount of \$5,000 each, in recognition of the services they rendered on behalf of the class. Additionally, Plaintiffs respectfully request that the Court enter an Order approving of Juan Jose Salguero's retaliation payment in the amount of \$10,000 for the release of an additional claim against Defendants. This motion is made in connection with Plaintiffs' Motion for Certification of the Settlement Class, Final Approval of the Class Action Settlement, and

Approval of the FLSA Settlement in the above-captioned action.

Plaintiffs have submitted a Proposed Order, which includes the requested service awards and retaliation payment. The Proposed Order is attached to Plaintiffs' Notice of Motion for Final Approval of the Class Action Settlement, Approval of the FLSA Settlement, filed contemporaneously with this Motion, for the Court's convenience.

Dated: July 21, 2015  
Melville, New York

Respectfully submitted,  
ARCHER, BYINGTON, GLENNON & LEVINE, LLP

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*Attorneys for Plaintiffs and the Proposed Class*